

5. Plaintiff filed her Amended Complaint on March 27, 2022. (ECF No. 12).

6. The Defendant answered the Complaint on April 18, 2022. (ECF No. 20).

7. On June 6, 2022, Plaintiff filed her first Motion for Extension of Time to Complete Discovery (ECF No. 22).

8. Plaintiff requested that she be given 90 days from the Defendant's Answer to Plaintiff's Amended Complaint. (ECF No. 22).

9. Plaintiff argued that she could not, in good faith, pursue discovery before Defendant had filed its response because it had threatened, through counsel to file another Motion to Dismiss. (ECF No. 22).

10. Therefore, whether the case would proceed was, at that time, unknown.

11. Besides, Plaintiff could not properly circumscribe written discovery because she did not have Defendant's Answer.

12. Plaintiff argued that she should be permitted ninety (90) days from April 18, 2022, to complete her discovery.

13. By this measure, the discovery period would end on July 21, 2022.

14. The Court, although stating on the record that Plaintiff's motion was denied, permitted discovery to end on June 29, 2022. (ECF No. 23).

15. Plaintiff sent Defendant the names of her required deponents on June 10, 2022. (Exhibit A).

16. Plaintiff heard nothing about their availability and followed up on June 15, 2022. (Exhibit B).

17. Plaintiff tried to be flexible and cooperative. (Exhibit B).

18. Defendant responded on June 20, 2022, setting up one deposition for Monday, June 27, and reserving the whole day on June 28, 2022 (Exhibit C)

19. Unfortunately, on these two days, Plaintiff's lawyer is in Court.

20. Plaintiff communicated his unavailability. (Exhibit D).

21. Plaintiff, therefore, requested that deponents be made available on Wednesday, June 29, 2022, through Friday, July 1, 2022, inclusive.

22. Defendant said it would only make two deponents available on Wednesday, June 21, 2022, and asked Plaintiff to designate which ones should be deposed.

23. At this point, Plaintiff thought it best to request a discovery extension.

24. During the pendency of this case, Plaintiff and Defendant have worked together in good faith to resolve any discovery impasse.

25. Because of the Court's current motions deadline and the imminent July 4, 2022, weekend, Defendant has no issue with this request for a continuance provided that the Court concomitantly extends the remaining deadlines.

26. Plaintiff understands that Defendant would be at a disadvantage if depositions were taken on the eve of its preparation for summary judgment, especially given the July 4th weekend.

27. Plaintiff submits that, under these specific circumstances, there is good cause to extend discovery and respectfully requests that the Form of Order filed hereto be executed by the Court.

WHEREFORE, Plaintiff Lisa Carlson submits that, under these specific circumstances, there is good cause to extend discovery and respectfully requests that the Court execute the form of order attached and filed hereto

Respectfully submitted,

KOLMAN LAW, P.C.

/s/ Timothy M. Kolman

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Dated: June 22, 2022, Tkolman@KolmanLaw.com

